



BOULT ■ CUMMINGS
CONNERS ■ BERRY^{PLC}

REC'D TN
REGULATORY AUTHORITY
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November 16, 2001 OFFICE OF THE
EXECUTIVE SECRETARY

David Waddell, Esq.
Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37243-0505

Re: Complaint of BellSouth Telecommunications, Inc. Regarding the
Practices of Global Crossing Telecommunications, Inc. in the Reporting of
Percent Interstate Usage for Compensation for Jurisdictional Access
Services
Docket No. 01-00913

Dear David:

Please accept for filing the original and thirteen copies of A Motion to Exceed
Forty Discovery Requests and Memorandum in Support filed on behalf of Global Crossing
Telecommunications, Inc. in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: *Henry Walker*
Henry Walker *HW*

HW/nl

Attachment

c: Guy Hicks, Counsel for BellSouth Telecommunications, Inc.

Re: Complaint of BellSouth)
Telecommunications, Inc. Regarding the) Docket No. 01-00913
Practices of Global Crossing)
Telecommunications, Inc. in the Reporting of)
Percent Interstate Usage for Compensation)
for Jurisdictional Access Services.)

- 1 -


Global Crossing has filed 31 interrogatories with ten sub-parts and nineteen requests for the production of documents, with ten sub-parts (total of seventy discovery questions).

Global Crossing submits that the number of issues raised in this case, especially when the parties begin examining the accuracy of the Agilent system, will require substantially more discovery than the typical complaint proceeding. Therefore the Hearing Officer should allow Global Crossing to submit all seventy discovery questions. BellSouth, of course, is free to object to any discovery questions on the grounds that the questions is burdensome or irrelevant. But if the question is neither, it should not be stricken merely because it exceeds the forty-questions limitation.

Respectfully submitted,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: _____


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*Counsel for Global Crossing Telecommunications,
Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been forwarded via fax or hand delivery and U.S. mail to the following on this the 16th day of November, 2001.

Guy Hicks, Esq.
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, TN 37201-3300

A handwritten signature in black ink, appearing to read "Guy Hicks", is written over the printed name and address.